

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION
CASE NO. 4:25-cv-5415-JD

Wild Geese Consultants, LLC; and
Purpose - SC, Inc.,

Plaintiffs,

v.

Broadstep Behavioral Health, Inc.;
Excalibur Youth Services, LLC; Bain
Capital Double Impact, LP; and Jason
Upham,

Defendants.

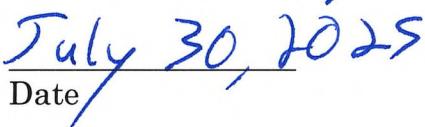
**DECLARATION OF
MATTHEW HUGHES**

Matthew Hughes hereby submits this declaration in support of Broadstep Defendants' Motion to Recognize Certain Requests for Admission as being deemed admitted.

1. On June 23, 2025, my office served discovery requests on both plaintiffs.
2. These discovery requests included requests for admission.
3. Neither plaintiff served responses to these requests for admission by

July 29, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Matthew A. Hughes

Date